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 2 United States Attorney

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8 Attorneys for United States of America

I hereby certify that the annexed
 instrument is a true and correct
 copy of the original filed in my
 office. ATTEST FILED.
 RICHARD W. WIEKING
 Clerk, U.S. District Court
 Northern District of California
 By:

Deputy Clerk JUL 8 - 2014

RICHARD W. WIEKING
 NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE

Filed

10 UNITED STATES DISTRICT COURT
 11 NORTHERN DISTRICT OF CALIFORNIA

12 SAN JOSE DIVISION
 13 CR 14 CASE NO.

UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 CAMERON LACROIX,

17 Defendant.

) VIOLATION: 18 U.S.C. §§ 1030(a)(5)(A) and
) (c)(4)(B)(i) – Intentionally Causing Damage to a
) Protected Computer; 18 U.S.C. §§ 982(a)(2)(B) and
) 1030(i) – Criminal Forfeiture

) SAN JOSE VENUE

E/D HRL

20 INFORMATION

21 The United States Attorney charges:

22 At all times relevant to this Information, unless otherwise indicated:

23 Background

24 1. Cameron LACROIX, who was also known by his online monikers “cam0,” “@Freak,”
 25 and “leetjones,” lived in New Bedford, Massachusetts.

26 2. Zendesk, a company based in San Francisco, California, provided a helpdesk platform for
 27 numerous companies, including Twitter, also headquartered in San Francisco. When a Twitter user had
 28 an issue with his or her account and submitted a trouble ticket, it was stored and managed at Zendesk

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1 | and routed to a Twitter employee to be resolved.

2 3. Between February 16 and February 19, 2013, LACROIX identified and exploited a
3 website vulnerability to create Zendesk accounts with elevated privileges. He used this heightened
4 access to disable a security measure designed to ensure that only Twitter employees could view Twitter
5 helpdesk information stored at Zendesk, such as support tickets, customer email addresses, and other
6 contact information. LACROIX was thereby able to see all support tickets for any of Zendesk's
7 customers, including Twitter. LACROIX then exported approximately one million Twitter support
8 tickets to computers outside of Zendesk's network. Those support tickets included email addresses and
9 contact information for each customer.

10 4. LACROIX identified the email addresses that were used to register Twitter accounts for
11 Jeep and Corporation A. After compromising and taking control of those email addresses, he submitted
12 password reset requests for those accounts; Twitter's responses were sent to the compromised email
13 addresses, which LACROIX now controlled. LACROIX changed the passwords to Jeep and
14 Corporation A's Twitter accounts, assumed control of those accounts, and proceeded to deface them
15 with text and pictures. (For example, Corporation A's feed falsely reported that the company had been
16 sold to its chief competitor.) LACROIX also deleted the incoming support tickets those companies
17 attempted to submit to Zendesk reporting that their Twitter accounts had been hijacked.

18 5. Zendesk and Twitter incurred combined losses of over \$200,000 in responding to the
19 attacks.

20 COUNT ONE: (18 U.S.C. §§ 1030(a)(5)(A) and (c)(4)(B)(i) – Intentionally Causing Damage to a Protected Computer)

⁶ See also the following section on the difficulties of following such a rule.

23 7. On or about and between February 16 and 19, 2013, in the Northern District of California, the defendant

CAMERON LACROIX

knowingly caused the transmission of a program, information, code, and command, and as a result of such conduct intentionally caused damage without authorization to a protected computer belonging to Zendesk;

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1 All in violation of Title 18, United States Code, Sections 1030(a)(5)(A) and (c)(4)(B)(i).

2 FORFEITURE ALLEGATION: (18 U.S.C. § 982(a)(2)(B) and 1030(i) – Forfeiture of Property
Used to Commit the Offense and Proceeds Derived Therefrom)

3
4 8. Paragraphs 1 through 5 as well as the factual allegations contained in Count One are
5 alleged and by this reference fully incorporated here for the purpose of alleging forfeiture pursuant
6 to the provisions of 18 U.S.C. §§ 982(a)(2)(B) and 1030(i).

7 9. Upon conviction of the offense alleged in Count One of this Information, the
8 defendant,

9 CAMERON LACROIX,

10 shall forfeit to the United States of America the following:

11 (a) Pursuant to Title 18, United States Code, Sections 982(a)(2)(B) and 1030(i),
12 any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly
13 as a result of such offense; and

14 (b) Pursuant to Title 18, United States Code, Section 1030(i), any personal property
15 that was used or intended to be used to commit or to facilitate the commission of such offense, including
16 one red and black Gigaware 8GB thumb drive and one Toshiba laptop computer, both seized by law
17 enforcement on May 8, 2013.

18 10. If any of said property, as a result of any act or omission of the defendant –

19 (a) cannot be located upon the exercise of due diligence;
20 (b) has been transferred or sold to or deposited with, a third person;
21 (c) has been placed beyond the jurisdiction of the Court;
22 (d) has been substantially diminished in value; or
23 (e) has been commingled with other property which cannot be subdivided
24 without difficulty;

25 any and all interest defendant has in other property shall be vested in the United States and forfeited to
26 the United States pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18,
27 United States Code, Sections 982(b)(1), 1030(i)(2), and Rule 32.2 of the Federal Rules of Criminal

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1 Procedure.

2 DATED:

7/2/14

MELINDA HAAG
United States Attorney

MATTHEW A. PARRELLA
Chief, Computer Hacking/Intellectual Property

6 (Approved as to form:)

7 AUSA David R. Callaway

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AO 257 (Rev. 6/78)

E-FILING**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT**

BY: COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING

OFFENSE CHARGED

18 U.S.C. § 1030(a)(5)(A) and (c)(4)(B)(i) - Intentionally Causing Damage to a Protected Computer

Petty
 Minor
 Misdemeanor
 Felony

PENALTY: Up to 10 years imprisonment, \$250,000 fine (or twice the gross gain or gross loss), 3 year term of supervised release, \$100 special assessment, plus restitution

CR14

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

DEFENDANT - U.S.

CAMERON LACROIX

DISTRICT COURT NUMBER

00349 EJD HRL**PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)

S/A Scott Hellman, FBI

 person is awaiting trial in another Federal or State Court, give name of court this person/proceeding is transferred from another district per (circle one) FRCrP 20, 21, or 40. Show District this is a reprocsecution of charges previously dismissed which were dismissed on motion of: U.S. ATTORNEY DEFENSE

SHOW DOCKET NO.

 this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.

 prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded underName and Office of Person Furnishing Information on this form MELINDA HAAG U.S. Attorney Other U.S. AgencyName of Assistant U.S. Attorney (if assigned) DAVID R. CALLAWAY**DEFENDANT****IS NOT IN CUSTODY**Has not been arrested, pending outcome this proceeding.
1) If not detained give date any prior summons was served on above charges2) Is a Fugitive3) Is on Bail or Release from (show District)**IS IN CUSTODY**4) On this charge5) On another conviction Federal State6) Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

Has detainer Yes
been filed? NoIf "Yes"
give date
filed

DATE OF ARREST

Month/Day/Year

Or... If Arresting Agency & Warrant were not

DATE TRANSFERRED
TO U.S. CUSTODY

Month/Day/Year

 This report amends AO 257 previously submitted**PROCESS:** SUMMONS NO PROCESS* WARRANT

Bail Amount: _____

If Summons, complete following:

 Arraignment Initial Appearance

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Defendant Address:

c/o Behzad Mirhashem, 51 Sleeper St., 5th Floor, Boston, MA 02210

Date/Time: _____ Before Judge: _____

Comments: Defendant will submit request to transfer case to the District of Massachusetts per Rule 20, Fed. R. Crim. P.

ADDITIONAL INFORMATION OR COMMENTS	
<p>PROCESS:</p> <p><input type="checkbox"/> SUMMONS <input checked="" type="checkbox"/> NO PROCESS* <input type="checkbox"/> WARRANT</p> <p>If Summons, complete following:</p> <p><input type="checkbox"/> Arraignment <input type="checkbox"/> Initial Appearance</p> <p>Defendant Address: c/o Behzad Mirhashem, 51 Sleeper St., 5th Floor, Boston, MA 02210</p> <p>Comments: Defendant will submit request to transfer case to the District of Massachusetts per Rule 20, Fed. R. Crim. P.</p>	

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United States District Court
Northern District of California

JULY 2 - 2014

CRIMINAL COVER SHEET

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE

Instructions: Effective January 3, 2012, this Criminal Cover Sheet must be completed and submitted, along with the Defendant Information Form, for each new criminal case.

Case Name:

USA v. Cameron LaCroix

CR 14 00349**Case Number:****EJD****HRL****Total Number of Defendants:**1 2-7 8 or more **Is This Case Under Seal?**Yes No **Does this case involve ONLY charges under 8 U.S.C. § 1325 and/or 1326?**Yes No **Venue (Per Crim. L.R. 18-1):**SF OAK SJ EUR MON **Is any defendant charged with a death-penalty-eligible crime?**Yes No **Assigned AUSA (Lead Attorney):**

David R. Callaway

Is this a RICO Act gang case?Yes No **Date Submitted:**

July 2, 2014

Comments:**Save****Print****Clear Form**